

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA, <i>ex rel.</i> ALEX DOE, Relator,	§ § § §	
THE STATES OF TEXAS, <i>ex rel.</i> ALEX DOE, Relator,	§ § § §	
THE STATE OF LOUISIANA, <i>ex rel.</i> ALEX DOE, Relator, <i>Plaintiffs,</i>	§ § § § §	
v.	§ § § § §	Civil Action No. 2-21-CV-022-Z
PLANNED PARENTHOOD FEDERATION OF AMERICA, INC., <i>et al.</i> , <i>Defendants.</i>	§ § § §	

UNOPPOSED MOTION TO WITHDRAW COUNSEL

The State of Texas files this Unopposed Motion to Withdraw Counsel in the above-styled case, and respectfully shows as follows:

1. The State of Texas is represented by the Office of Attorney General in the above-captioned cause. Its lead counsel is Assistant Attorney General Raymond C. Winter.
2. Assistant Attorney General Halie Daniels was previously counsel for the State of Texas in the above-captioned cause.
3. Ms. Daniels is no longer employed by the Office of Attorney General. Accordingly, she no longer has authority to represent the State of Texas in this matter. *See, e.g., Pub. Utility Comm'n of Tex. v. Cofer*, 754 S.W.2d 121, 123 (Tex. 1988) (holding that “assistant attorneys general have no constitutional or statutory authority that is not derived directly from the Attorney General himself”).

4. Undersigned counsel and Assistant Attorney General Amy Hilton will remain counsel of record for the State of Texas.
5. Defendants are unopposed to this Motion.
6. For the foregoing reasons, the State of Texas respectfully requests that the Court note the withdrawal of Halie Daniels as counsel of record in the above-styled and numbered case.

Dated: June 14, 2022

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN E. COWLES
Deputy Attorney General for Civil Litigation

/s/ Raymond Charles Winter
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ATTORNEYS FOR THE STATE OF TEXAS

CERTIFICATE OF CONFERENCE

On June 14, 2022, I conferred with counsel for Defendants, Tirzah Lollar, who indicated Defendants are unopposed to this motion.

/s/ Raymond C. Winter

RAYMOND C. WINTER

Chief, Civil Medicaid Fraud Division

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was filed electronically via CM/ECF on June 14, 2022, causing electronic service on all counsel of record

/s/ Raymond C. Winter

RAYMOND C. WINTER

Chief, Civil Medicaid Fraud Division